

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

JUL 07 2021

UNITED STATES OF AMERICA,

U.S. DISTRICT COURT-WVND  
CLARKSBURG, WV 26301

v.

Criminal No. *5:21cr19*

Violations: 18 U.S.C. § 2252A(a)(3)(B)  
18 U.S.C. § 2252A(b)(1)

ROBERT EUGENE "BOB" WILSON,

Defendant.

INDICTMENT

COUNT ONE

(Solicitation of Child Pornography)

From on or about October 12, 2019 to on or about October 15, 2019, in Ohio County, in the Northern District of West Virginia and elsewhere, defendant, **ROBERT EUGENE "BOB" WILSON**, did knowingly solicit, using any means and facility of interstate commerce, and in and affecting interstate commerce by any means, including by computer, any material in a manner that reflects the belief, and that is intended to cause another to believe, that the material is and contains a visual depiction of an actual minor engaging in sexually explicit conduct, in violation of Title 18 United States Code Sections 2252A(a)(3)(B) and 2252A(b)(1).

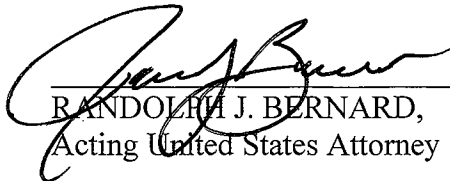
**FORFEITURE ALLEGATION**

(Child Exploitation Offenses)

Pursuant to Title 18, United States Code, Section 2253, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter, any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, and any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from a violation of Title 18, United States Code, Section 2252A, including a **black Samsung cell phone, Model SM-S327VL(GP), IMIE No. 355744095024364, with black case.**

True Bill,

/s/  
Foreperson

  
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RANDOLPH J. BERNARD,  
Acting United States Attorney

David J. Perri, Assistant United States Attorney